

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

DR. MANHUA MANDY LIN

Plaintiff

vs.

ROHM AND HAAS COMPANY

Defendant

CIVIL ACTION NO. 02-CV-3612

JURY TRIAL DEMANDED

**PLAINTIFF, DR. MANHUA MANDY LIN'S RESPONSES AND
OBJECTIONS TO DEFENDANT, ROHM AND HAAS COMPANY'S
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO PLAINTIFF**

GENERAL OBJECTIONS

1. Dr. Manhua Mandy Lin objects to each Document Request to the extent that it seeks information protected from discovery by the attorney-client privilege, the attorney work product doctrine, any other applicable privilege, or that would result in disclosure of the mental impressions, conclusion, opinions, memoranda, notes or summaries, legal research, or legal theories of Dr. Lin's attorney.
2. Dr. Manhua Mandy Lin objects to each Document Request to the extent that it seeks information that result in disclosure of the mental impressions, conclusions, or opinions of Dr. Lin's non-attorney representatives respecting the value or merit of a claim or defense or respecting strategy or tactics.
3. Dr. Manhua Mandy Lin objects to each Document Request to the extent it seeks to impose obligations or burdens beyond those set forth in the Federal Rules of

Civil Procedure and the applicable statutes and case law. Responses are limited to those required by the applicable procedural rules and decisional authorities.

4. Dr. Manhua Mandy Lin objects to each Document Request to the extent that it uses undefined terms, and/or is vague, ambiguous, unintelligible, and unanswerable in its current form.

5. Dr. Manhua Mandy Lin objects to each Document Request to the extent that it is overly broad, unduly burdensome, or oppressive.

6. Dr. Manhua Mandy Lin objects to each Document Request to the extent that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

7. Dr. Manhua Mandy Lin objects to each Document Request to the extent that it requires production of documents not within the present possession, custody, or control of Dr. Lin.

8. Dr. Manhua Mandy Lin objects to each Document Request to the extent that it requests documents that are already in the possession of Defendant or documents that are equally available to Defendant.

9. Dr. Manhua Mandy Lin objects to each Document Request that are not limited by time.

10. To the extent that Dr. Manhua Mandy Lin objects to particular Document Request on the basis of a specific objection, Dr. Lin hereby states that she does not thereby waive these General Objections. To the extent that Dr. Lin objects to a particular Document Request but proceeds to answer said Document Request in whole or in part,

Dr. Lin hereby states that it does not thereby waive any objections to the Document Request in questions.

PRESERVATIONS OF RIGHTS

All responses to these Document Requests are made without in any way waiving or intending to waive, but on the contrary, intending to reserve and reserving:

1. All questions as to competency, relevancy, materiality, privilege, and admissibility for any purpose in any subsequent proceeding, the trial of this action, or any other action.
2. The right to object on grounds of relevance, competency, hearsay, or any other proper ground to the use of any information requested, or the subject matter thereof, in any subsequent proceeding, the trial of this action, or any other action.
3. The right to object on any grounds at any time to a demand for further responses to these Document Requests or other discovery proceedings involving or relating to the subject matter of the Document Requests herein answered.
4. The right at any time to revise, correct, supplement, clarify, and/or amend the responses and objections set forth herein.

Responses to specific Document Requests

1-125. To be supplied, subject to the foregoing objections.

Respectfully submitted,

Leonard, Tillery & Sciolla, LLP

By: 

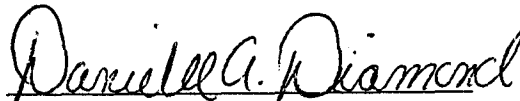
Hugh J. Hutchison

Date: 4/12/03

CERTIFICATE OF SERVICE

I, Danielle A. Diamond, hereby certify that I caused a copy of the foregoing **PLAINTIFF, DR. MANHUA MANDY LIN'S RESPONSES AND OBJECTIONS TO DEFENDANT, ROHM AND HAAS COMPANY'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO PLAINTIFF** was served upon the following via email on May 12, 2003 and served upon the following via hand delivery this 13th day of May, 2003:

Via Hand Delivery
Raymond A. Kresge, Esquire
Klett Rooney Lieber & Schorling, P.C.
12th Floor Logan Square
Philadelphia, PA 19103-2756



Danielle A. Diamond
Legal Assistant to
HUGH J. HUTCHISON, ESQUIRE

Date: 4/13/03